

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WILLIAM C. BOND,

*

Plaintiff

*

v.

*

Civil Action No. MJG-01-2600

KENNETH BLUM, SR., *et al.*,

*

Defendants

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* * * * *

MOTION TO SHORTEN TIME FOR THE JUDGMENT CREDITOR,
McDANIEL, BENNETT & GRIFFIN TO RESPOND TO
MOTION FOR RELEASE OF FUNDS
HELD BY BANK OF AMERICA THAT WERE PLACED ON HOLD
BY BANK OF AMERICA
PURSUANT TO WRIT OF GARNISHMENT (PAPER No. 146)

Plaintiff, William C. Bond, and Alyson Bond, his wife, by Howard J. Schulman
and Schulman & Kaufman, LLC, their attorneys, state as follows:

1. The Judgment Creditor has attached three accounts, as noted in the Motion in chief, which constitute the joint marital accounts used by William C. Bond and Alyson Bond during their daily living to pay their bills and expenses. The Garnishee's hold on these accounts prevents William C. Bond and Alyson Bond from making their mortgage payment and, most importantly, payment of Alyson Bond's health insurance premium. Alyson Bond is presently using her health insurance for treatment of lymphoma, a malignant form of cancer. The hold on the three accounts in question has also caused a number of checks to bounce as a consequence of the garnishment.

2. Caroline A. Griffin, a partner with the Defendant, McDaniel, Bennett & Griffffin which serves as co-counsel in the underlying domestic case, has obtained through subpoenas in the domestic case copies of all of the bank account records related to these accounts. Nonetheless, William C. Bond and Alyson Bond have authorized undersigned counsel to state that they do not object to the release of the Bank of America records to McDaniel, Bennett & Griffin on the same terms and conditions as those released to Adelberg, Rudow, Dorf & Hendler, LLC.

WHEREFORE, for the aforementioned reasons, William C. Bond and Alyson Bond request that the Court shorten the time for the Judgment Creditor, McDaniel, Bennett & Griffin, to respond to this Motion to on or before Monday, June 2, 2003.

HOWARD J. SCHULMAN
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Baltimore, Maryland 21201
(410) 576-0400
Attorneys for Plaintiff and Alyson Bond

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of May, 2003, a copy of the foregoing Motion was sent by facsimile (410-385-3700) and mailed first-class, postage prepaid, to E. Hutchinson Robbins, Jr., Esquire, Miles & Stockbridge, P.C., 10 Light Street, Baltimore, Maryland 21202, attorneys for Bank of America, N.A.

HOWARD J. SCHULMAN